

Cabrillo Power I LLC

June 4, 2001

Mr. Brian Baird, Ocean Program Manager
Resources Agency of California
1416 Ninth Street, Suite 1311
Sacramento, California 95814

RE: *Draft Policy on Coastal Erosion Planning and Response for California*

Dear Mr. Baird:

Cabrillo Power commends the State Resources Agency for its efforts in creating a draft comprehensive policy addressing coastal erosion and protection. As the owner and manager of the Agua Hedionda Lagoon and coastal dependent Encina Generating Station, Cabrillo Power maintains a keen interest in coastal land use planning and policy issues. Cabrillo Power has reviewed the above-referenced document and offers the following comments for your review and consideration.

Where possible, coastal planning and policy should be proactive. In locations where the shoreline is already developed, the ability to be proactive may be limited. However, it is in these very instances where coastal policy decisions will be most critical and therefore, must be based on scientific analysis and well reasoned judgment. Substantial investment of public funds have been, and continue to be, committed in the form of infrastructure along the coastline including roadways, railways, water, sewer and other utility-related infrastructure improvements. Therefore, the urbanized coastline must be managed and protected.

Due to the site specific and highly dynamic nature of coastal processes, a solution that is viable in one location may not be viable in the next. Clearly, there is no panacea on the horizon for remedying our shoreline woes. The solution must be implemented in the form of a multi-pronged approach that incorporates principles of hazard avoidance, increasing the amount of sand in the littoral system and protective structures which are designed to keep the sand on the beach, provide for public coastal access and minimize adverse impacts. The *Draft Policy on Coastal Erosion Planning and Response* suggests that regional shoreline management strategies be developed. We agree that this approach would be best, provided flexibility is built into the management plan which allows regional and local governments to respond to changing environmental conditions, scientific development and other new discoveries in the field of coastal science and engineering.

Hazard avoidance is common sense. Fifty years ago developments were built along the shoreline without regard to shoreline erosion due to a lack of understanding of shoreline processes. Today, new developments along the coast are regulated by local, regional, state and federal agencies based on a better understanding of shoreline processes. Beach nourishment has already become a key component of increasing the amount of sand along the shore. In addition, sediment accumulation behind dams and other structures must be seriously considered as a source of

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potentially suitable beach sand. Sand that is mined and used in the production of concrete and other similar building materials could be purchased by jurisdictions for used for beach replenishment. Financial incentives could be provided to the mining companies in return for discounting the price of sand to ensure that the costs of obtaining this sand are commensurate with the cost of obtaining sand from offshore borrow sites. At this point, all potential sources of sand, including out of state sources of sand such as in Arizona and Nevada, should be evaluated and explored. California's beaches are after all, enjoyed by visitors from varied locations. Therefore, the search for new sand sources should be similarly broad.

Because of the high costs associated with beach nourishment, there is a compelling financial interest in ensuring that the sand spends a maximum amount of time on the beach where it can provide maximum recreational value and shoreline protective benefit. However, the *Draft Policy on Coastal Erosion Planning and Response* reflects a fairly hard-line position opposed to the use of protective structures in all but the most dire of circumstances. Because of advances in coastal engineering and the increased understanding of the dynamic nature of coastal science, an indiscriminate opposition to hard structures is inappropriate. Well-designed shoreline protective/sand retention structures will likely be appropriate in some locations where they will be effective in retaining sand while minimizing adverse impacts. The benefits of short groins which do not pierce the surf zone and which are located upcoast of sediment sinks should be seriously explored as a supplements to beach nourishment projects. In addition, protective structures can be used at lagoon mouths to provide some measure of protection from increased sedimentation associated with beach nourishment projects. Additional funding would then be available for obtaining more sand as opposed to spent mitigating and monitoring adverse impacts of beach nourishment efforts.

In closing, Cabrillo Power would also like to express their support for providing additional funding from the State and Federal government to universities, coastal scientists and other organizations committed to further study and understanding of coastal processes and the interaction of beach nourishment and hard structures along the California coastline.

Sincerely,



Ernest J. Soczka
Cabrillo Power I LLC

CC: Ann Kulchin, City of Carlsbad
Steve Aceti, California Coastal Coalition
Steve Sachs, SANDAG
Steve Jantz, Carlsbad Beach Erosion Committee